

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

PARKER TIRRELL and IRIS TURMELLE,

Plaintiffs,

v.

FRANK EDELBLUT, in his official capacity as
Commission of the New Hampshire Department
of Education, *et al.*,

Defendants.

Case No. 1:24-cv-00251-LM-TSM

**JOINT MOTION TO EXTEND TIME TO FILE OBJECTION & REPLY
TO STATE DEFENDANTS' PARTIAL MOTION TO DISMISS**

NOW COME all parties, by and through their respective counsel, and jointly move pursuant to Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure and Rule 7.2(a) of the Local Rules of the United States District Court for the District of New Hampshire, to extend deadlines related to State Defendants' Partial Motion to Dismiss (ECF No. 88), and state as follows:

1. On December 6, 2024, Defendants Frank Edelblut, Andrew Cline, Kate Cassady, Ann Lane, Philip Nazzaro, Rajesh Nair, James Fricchione, and James Laboe (collectively, the "State Defendants"), filed their Partial Motion to Dismiss the First Amended Complaint, pursuant to Rule 12 of the Federal Rules of Civil Procedure. ECF No. 88.

2. Plaintiffs' Objection to State Defendants' Motion must be filed on or before December 20, 2024. *See* LR 7.1(b). State Defendants' Reply to Plaintiffs' Objection will likely be due on or before December 27, 2024. *See* LR 7.1(e).

3. Given the proximity of the holidays and counsels' existing caseloads, the parties require additional time to adequately address the issues raised by State Defendants' Partial Motion to Dismiss the First Amended Complaint.

4. Thus, the parties respectfully request that the Court extend Plaintiffs' deadline to file their Objection to January 10, 2025, and extend State Defendants' deadline to file their Reply to Plaintiffs' Objection to January 31, 2025.

5. These extensions will not continue or delay any hearing, conference, or trial.

WHEREFORE, the parties respectfully request that this Honorable Court:

- A. Grant this Joint Motion to Extend Time;
- B. Allow Plaintiffs to file their Objection to Defendants' Partial Motion to Dismiss the First Amended Complaint on or before January 10, 2025;
- C. Allow State Defendants to file their Reply to Plaintiffs' Objection on or before January 31, 2025; and
- D. Grant such further relief as is just and equitable.

Respectfully submitted,

DEFENDANTS FRANK EDELBLUT,
ANDREW CLINE, KATE CASSADY, ANN
LANE, PHILIP NAZZARO, RAJESH NAIR,
JAMES FRICCHIONE, and JAMES LABOE

By their attorneys,

JOHN M. FORMELLA
ATTORNEY GENERAL

Date: December 11, 2024

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PARKER TIRRELL, by her parents and next friends SARA TIRRELL and ZACHARY TIRRELL,

and

IRIS TURMELLE, by her parents and next friends AMY MANZELLI and CHAD TURMELLE,

By their attorneys,

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on all parties of record through the Court's e-filing system.

/s/ Michael P. DeGrandis

Michael P. DeGrandis